

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In Re: Zurn Pex Plumbing
Products Liability Litigation

Court File No. 08-MDL-1958 ADM/AJB

This Document Relates to:

All Actions

Motion for Final Approval of Class Action Settlement

TO: Defendants above-named and their attorneys, James A. O'Neal, Daniel J. Connolly, and Amy R. Fiterman, Faegre Baker Daniels LLP, 90 South Seventh Street, Suite 2200, Minneapolis, MN 55402.

Motion

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs and the preliminarily approved settlement class, by and through their attorneys and with the consent of Defendants, hereby move the Court for final approval of a nationwide class action settlement and for an order that provides the following relief:

- (1) grants final approval of the settlement and finds it fair, reasonable, and adequate under the circumstances of this litigation;
- (2) appoints class representatives and class counsel to represent the settlement class;
- (3) concludes that the notice provided to the class constituted reasonable and best practicable notice under the circumstances to apprise class members of their rights under the settlement and to provide them with an opportunity to be heard or to exclude themselves from the settlement;

(4) concludes that the notice provided to state and federal authorities complied with 28 U.S.C. § 1715;

(5) adopts and incorporates the terms of the parties' Settlement Agreement into the Court's order and judgment;

(6) binds all class members who did not submit timely and valid requests for exclusion from the settlement by the releases provided in the Settlement Agreement; and

(7) lifts the injunction issued in the Court's order granting preliminary approval of this settlement for class members who submitted timely and valid requests for exclusion from this settlement.

Dated this 19th day of February, 2013.

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